

Remarks

Claims 1-3, 6-8 and 12-17 are currently pending in the present patent application. Claims 1 and 13-14 are amended. In view of at least the following, all currently pending claims are in condition for allowance, and, therefore, the Applicants' attorney requests that the Examiner withdraw all outstanding rejections. ***However, if after considering this response the Examiner does not allow all of the claims, the Applicants' attorney requests that the Examiner contact him to schedule a telephone interview to further the prosecution of this application.***

Rejection of claims 1-3, 6-8 and 12-17 as being unpatentable under 35 U.S.C. § 103(a) over Koch (U.S. Patent No. 6,153,946) in view of Coglitore (U.S. 2004/0228087) in further view of Stale (U.S. Patent No. 5,861,684)

Claim 1

Claim 1 as amended recited in relevant part an interconnect arrangement including a plurality of interconnects, the interconnects directly connecting each load to each of the sources in parallel such that each load is fully powered and if any one source fails, each load remains fully powered.

For example, referring, e.g., to paragraphs 33-34 and 38 and FIGS. 4-5 and 9 of the present application, each load is directly connected to each of a plurality of power sources in parallel, where each power source has a capacity less than each load. Because each load is directly connected to each power source in parallel, if any one source fails, each load remains fully powered.

Koch is directed at providing redundant power by connecting power supplies in series as a segment or ring. Koch provides redundant power through a "cascade" effect, drawing excess power from multiple sources by allowing each source to "borrow" power from the source immediately upstream in the series. Koch does not teach a system of interconnects between power sources wherein each source is directly connected in parallel such that each load is fully powered and if any one source fails, each load remains fully powered.

Coglitore is directed to a computer rack system in various configurations with the purpose of conserving space and dealing with cooling issues associated with housing a large number of computers. Coglitore does not teach or suggest directly connecting each load to each of the sources in parallel such that each load is fully powered and if any one source fails, each load remains fully powered. Referring, *e.g.*, to FIGS. 7A-9, Coglitore discloses that the bank of loads 8 is connected to a bank of power sources via a single parallel connection. Coglitore does not disclose or render obvious a direct connection between each load and each source in parallel.

Slade does not teach an interconnect arrangement directly connecting each load to each of the sources in parallel such that each load is fully powered and if any one source fails, each load remains fully powered. Instead, Slade teaches a configuration where the loads 4 draw power from "either rail A or rail B" at any given time, but not from both simultaneously (FIGS. 1-2; col. 3 line 4 – col. 4 line 2). Because bulk power supplies A and B are only connected to rail A, and batteries C and D are only connected to rail B (and bulk power supplies C and D and batteries A and B are connected to either rail A or rail B but not both), the loads 4 are not simultaneously connected to every source in parallel.

The combination of Koch, Coglitore and Slade neither discloses nor suggests the recited combination of elements recited in claim 1, and therefore cannot satisfy the limitations of that claim.

Moreover, Applicants' attorney respectfully disputes the Examiner's assertion that one of ordinary skill in the relevant art would be motivated to combine the teachings of these three disparate references. On page 3 of the instant Office Action, the Examiner cites Coglitore for teaching an interconnect arrangement connecting each load to each of the sources in parallel such that each load is fully powered and if any one source fails, each load remains fully powered. The combination of these three disparate references and motivations appears to be no more than impermissible hindsight—reading the applicants' own teachings back into the cited prior art to support the proposed motivations.

For at least these reasons, the combination of elements recited in claim 1 is allowable.

Claims 2-3, 6-8 and 12

These claims are patentable at least by virtue of their respective dependencies from claim 1.

Claim 13

This claim is patentable at least for reasons similar to those discussed above with respect to claim 1.

Claim 14

This claim is patentable at least for reasons similar to those discussed above with respect to claim 1.

Claims 15-17

These claims are patentable at least by virtue of their respective dependencies from claim 14.

Conclusion

The absence of additional patentability arguments should not be construed as either a disclaimer of such arguments or that such arguments are not believed to be meritorious. In light of at least the reasons discussed herein, existing claims 2-3, 6-8, 12 and 15-17 and amended claims 1 and 13-14 are in condition for allowance. Favorable consideration and a Notice of Allowance are respectfully requested. Should the Examiner have any further questions about the application, Applicant respectfully requests the Examiner to contact the undersigned attorney at (425) 455-5575 to resolve the matter.

The filing of this document constitutes a request for any needed extension of time. The Commissioner is hereby authorized to charge any deficiency of fees submitted herewith, or credit any overpayment, to Deposit Account No. 07-1897.

Respectfully submitted,



James J. Carter
Registration No. 56,043

Graybeal Jackson Haley LLP
155 - 108th Avenue NE, Suite 350
Bellevue, Washington 98004-5973
Telephone: 425.455.5575
Facsimile: 425.455.1046